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December 30, 2011

Mr. Gary Greulich  
New Jersey Department of Environmental Protection  
Northern Regional Office  
7 Ridgedale Avenue  
Cedar Knolls, NJ 07927

RE: Remedial Action Progress Report No. 2 for the Industrial #2 Redevelopment Area  
Portion of the Former General Motors (GM) Linden Assembly Plant, 1016 West Edgar  
Road, Linden, Union County, New Jersey 07036; DUK059.701.0092.

Dear Mr. Greulich:

On June 3, 2011, the New Jersey Department of Environmental Protection (NJDEP) approved the New Jersey Remedial Action Workplan and RCRA Corrective Measures Proposal Addendum No. 4 (RAWP) for the Industrial #2 Redevelopment Area of the Former GM Linden Assembly Plant (Site; SRP PI# 014755; EA ID# SUB090001; BFO File Number: 20-09-24). The June 3, 2011 approval letter requested a Remedial Action Progress Report for the Industrial #2 Redevelopment Area on/by September 30, 2011. Subsequent reports will be submitted on a quarterly basis.

This letter constitutes Remedial Action Progress Report No. 2 for the Industrial #2 Redevelopment Area. Hull & Associates, Inc. (Hull) has prepared this report on behalf of Linden Development LLC (Linden Development) to summarize remedial activities completed on the Site between October 1, 2011 and December 30, 2011.

Requirements, according to N.J.A.C. 7:26E-6.6, are shown below in ***bold italics***, with Hull/Linden Development's update following. The report certification required by N.J.A.C. 7:26E-1.5 is included in Attachment A.

1. ***NJDEP requires a description of each planned remedial action***
  - i. ***scheduled to be initiated or completed within the reporting period;***
  - ii. ***actually initiated or completed during the reporting period; and***
  - iii. ***scheduled but not initiated or not completed during the reporting period, including the reasons for the noncompliance with the approved schedule.***

Soil

As outlined in the approved RAWP, the remedial activities for soils on the Industrial #2 Redevelopment Area consist of the following:

- a. Excavation of approximately 1,715 yd<sup>3</sup> of soil containing chemicals of potential concern (COPCs) at concentrations above applicable standards from AOI-7;



- b. Establishing deed restrictions or environmental covenants to maintain commercial/industrial land use at the Site;
- c. Regrading the site to achieve the grade necessary to support the proposed redevelopment;
- d. Constructing building slabs, parking areas and roadways and placing one foot of clean soil over geotextile fabric in future greenspaces to preclude direct contact exposures to future receptor populations and/or provide cover to historical fill material; and
- e. Surveying to demonstrate that all areas are covered with engineering controls (e.g., building slabs, parking areas and roadways) or one foot of clean soil.

With the exception of the targeted soil excavation activities within AOI-7, the remedial activities are directly related to construction activities associated with the future redevelopment at the Site which are dependent upon finalization of agreements with end users. Linden Development has been working throughout the reporting period to establish agreements with end users to ultimately occupy various portions of the Site. Given that end user agreements have not been established, the construction activities described in the RAWP have not yet been initiated.

During the reporting period, Linden Development started preparation of bid specifications for the AOI-7 excavation activities. Linden Development intends to finalize the bid specifications and solicit bids for conducting the work during the next reporting period. The AOI-7 activities are anticipated to be complete within 45 days of selecting a contractor.

#### Groundwater

The RAWP for the Industrial #2 Redevelopment Area was limited to soils. Groundwater actions, if any, are related to resolution of the disputed groundwater issue between the Site and neighboring Merck Pharmaceutical facility. While evaluation of the disputed groundwater issue is ongoing, it is anticipated that groundwater monitoring will likely be required for the Industrial #2 Redevelopment Area. The monitoring requirements will be determined as part of the ongoing disputed groundwater evaluations and outlined as part of a separate, future document.

#### Storm Sewer (AOI-18)

Remedial activities associated with AOI-18 are complete, as documented to NJDEP in previous reporting efforts associated with the neighboring Retail and Industrial #1 Redevelopment Areas. Specifically, the storm sewer activities were documented in *Remedial Action Progress Report No. 1 for the Retail Redevelopment Area Portion of the Former General Motors Linden Assembly Plant*, dated November 23, 2009 and in *Remedial Action Progress Report No. 1 for the Industrial No. 1 Redevelopment Area Portion of the Former General Motors Linden Assembly Plant*, also dated November 23, 2009.

- 2. NJDEP requires discussion of problems and delays in the implementation of the RAWP, which should include proposals for corrections.**

As discussed above, a majority of the remedial activities are directly related to construction activities associated with the future redevelopment at the Site which are dependent upon establishment of agreements with end users. Given current economic conditions, the construction activities described in the RAWP, with the exception of the AOI-7 excavation activities, will not be implemented until redevelopment deals with end users are established. Linden Development is continuing to pursue agreements with end users for the Industrial #2 Redevelopment Area. In the interim, conditions at the Site are stable given that GM's original cover types (asphalt, building pads, etc.) remain intact.

The AOI-7 excavation activities are anticipated to be initiated during the next reporting following finalization of the bid specifications and selection of an appropriate contractor.

**3. NJDEP requires proposals for a deviation from, or modification to, the approved RAWP.**

No deviations from, or modifications to, the approved RAWP are planned or required at this time.

**4. NJDEP requires submittal of a revised schedule pursuant to N.J.A.C. 7:26E-6.5, to reflect the changes as noted in 1 through 3 above.**

As noted above, establishment of agreements with end users is the driving force behind the redevelopment of the Site and full implementation of the RAWP. Linden Development continues to pursue agreements with end users and will provide updates in subsequent quarterly reports. The next progress report is scheduled to be submitted on or before March 31, 2012. The targeted excavation activities within AOI-7 are anticipated to be initiated during the next reporting period following finalization of the bid specifications and selection of an appropriate contractor.

**5. NJDEP requires an updated status of all permit applications relative to the critical path schedule.**

The permits required for initiation of the remedial activities are summarized below.

Permit/Approval Type	Status	Notes
Planning Board Approval	Approved 11/17/08	Site plan approved by City of Linden Planning Board
NPDES Permit (Storm Water)	Approved 9/16/09	NPDES Permit No. 0088323
Soil Conservation District	Approved 9/16/09	Approved by Somerset-Union Conservation District

**6. NJDEP requires a listing of each remedial action to be performed during the next reporting period.**

Linden Development anticipates finalizing bid specifications for the AOI-7 excavation activities early in the next reporting period. The AOI-7 activities will commence immediately upon completion of the bid process and establishment of a contract with the successful bidder. The AOI-7 excavation activities are anticipated to be complete within 45 days of awarding the contract.

**7. NJDEP requires costs of each remedial action**

- i. Annual summary of all remedial action costs incurred to date; and**
- ii. Revised cost estimate for remedial actions remaining to be performed.**

Given that significant construction and remedial implementation has not yet commenced, no significant remedial costs have been accrued, with the exception of minor costs for the storm sewer cleaning (i.e., approximately \$7,000).

The cost estimate for completing remedial activities remains consistent with that presented in the RAWP (i.e., approximately \$11,900,000 for earthwork and construction of engineering controls).

**8. NJDEP requires a tabulation of sampling results [according to N.J.A.C. 7:26E-3.13(c)(3)] received during the reporting period and a summary of the data and any conclusions, presented in a format consistent with N.J.A.C. 7:26E-4.8.**

No sampling results were received during the reporting period.

**9. NJDEP requires a summary of active groundwater remedial actions**

- i. groundwater elevation maps with groundwater flow shown immediately before and during active groundwater remediation;**
- ii. graphs depicting changes in concentrations over time for all impacted wells as well as all down-gradient wells;**
- iii. summary of volume of water treated since last reporting period and the total volume treated since active remedial action commenced; and**
- iv. Summary of groundwater contamination, indicating either that contamination remains above applicable standards (include a proposal detailing additional remedial actions) or that concentrations are below applicable standards.**

The RAWP for the Industrial #2 Redevelopment Area was limited to soils only. Therefore, this section is not applicable.

**10. NJDEP requires a summary of natural remediation groundwater remedial actions**

- i. Summary table of the groundwater monitoring results collected; and**
- ii. Conclusions whether data indicate that natural remediation is no longer appropriate (must then also submit a revised RAWP)**

The RAWP for the Industrial #2 Redevelopment Area was limited to soils only. Therefore, this section is not applicable.

**11. NJDEP requires a description of all wastes generated as a result of the remedial action**

- i. Tabulation of waste characterization samples collected, including the physical state of the material, volume, number of samples, analyses performed and results;**

- ii. Listing of types and quantities of waste generated by the remedial action during the reporting period as well as to date;*
- iii. Name of the disposal facility used;*
- iv. Transporters' dates of disposal; and*
- v. Manifest numbers of each waste shipment.*

No wastes were generated during the reporting period.

**12. NJDEP requires that any additional support documentation that is available also be provided (photos, etc.).**

Given that the majority of the remedial activities have not yet been implemented, no additional support documentation is available.

The next scheduled remedial action progress report will include remedial actions completed between January 1, 2012 and March 31, 2012. Please feel free to contact Bill Dennis at (412) 446-0315 with any questions regarding the update provided herein.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Dennis III". The signature is stylized with a large, looped "B" and "D".

Bill Dennis  
Senior Project Manager

Attachments

ct: Brian Strohl – Linden Development, LLC  
Clifford Ng – U.S. EPA Region 2

**ATTACHMENT A**

**Report Certification**

**Certification**

**Linden Development, LLC  
ISRA Case Number E20040531**

I certify under penalty of law that I have personally examined and am familiar with the information submitted herein including all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, to the best of my knowledge, I believe that the submitted information is true, accurate and complete. I am aware that there are significant civil penalties for knowingly submitting false, inaccurate or incomplete information and that I am committing a crime of the fourth degree if I make a written false statement which I do not believe to be true. I am also aware that if I knowingly direct or authorize the violation of any statute, I am personally liable for the penalties.

Date: 12/19/11

Linden Development, LLC

By:

WJ DeBoer  
William J. DeBoer, Executive V.P.

Sworn to and subscribed to before  
me on this 19th day  
of December, 2011

Deena E. Griest  
Notary



Deena E. Griest  
Notary Public - State of Ohio  
My Commission Expires  
May 29, 2012